

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

LIZETTE ALEJANDRO PENA

CASE NO. 21-00066
CHAPTER 13

DEBTOR(S)

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

TO THE HONORABLE COURT:

COMES NOW, ASOCIACION PASEO DE LA CEIBA through the undersigned attorney, and respectfully, prays and states as follows:

1. That the above reference captioned debtor filed her bankruptcy petition on January 17, 2021, a secured claim.
2. Asociación Paseo de La Ceiba filed Proof of Claim #3 in the amount of \$3,075.00.
3. In Chapter 13 Plan dated 8/20/2021, debtor filed section 3.2 asking for Request for valuation of security the HOA Paseo La Ceiba claim but debtor has failed to compliance with Federal Rule of Bankruptcy Procedure 3012 (b) and 7004.
4. For the aforementioned, debtor should amend Chapter 13 Plan to give the proper treatment as a secured claim to the HOA Paseo La Ceiba debt.
5. The secured amount of this debt is the full amount described in the Proof of Claim #3, \$3,075.00.

WHEREFORE, the creditor(s) respectfully request that this Honorable Court take acknowledge the above indicated.

NOTICE

Within fourteen (14) days after the service as evidenced by the certification – and an additional three (3) days pursuant to Fed. R. Bankr. P. 9006(f) if you were served by mail – any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, must serve, and file an objection or other appropriate response to this paper with the Clerk’s Office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no opposition or other response is timely filed within the time allowed herein, the paper will be deemed unopposed, unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; (3) in the opinion of the Court, the interest of justice otherwise requires.

I hereby certify: That on September 10, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Chapter 13 Trustee José R. Carrión Morales and to all other registered CM/ECF participants in the instant case; and **I further certify** that I have mail by the United States Postal Service copy of the present motion to debtor Lizette Alejandro Peña, Urb. Paseos de la Ceiba 182 Calle Arce D2 Juncos, PR 00777.

In Ponce, Puerto Rico, this 14th day of September 2021.

RESPECTFULLY SUBMITTED.

/s/Rafael Colón Flores

Rafael Colón Flores

Attorney for Creditor

U.S.D.C.P.R. 128203

1129 Muñoz Rivera Ave. STE 1

Ponce, P.R. 00717-0635

Tel. (787) 842-1039

Fax. (787) 284-0325

E-mail: bufetecolonflores@gmail.com